

Exhibit A



State of Alabama Unified Judicial System Form ARCiv-93 Rev.5/99	<div>COVER SHEET</div> <div>CIRCUIT COURT - CIVIL CASE</div> <div>(Not For Domestic Relations Cases)</div>	<div>Cas 63</div> <div>63-CV-2017-900442.00</div> <div>DATE OF FILING: 04/07/2017</div> <div>JUDGE CODE: 63</div> <div>CIRCUIT COURT OF TUSCALOOSA COUNTY, ALABAMA MAGARIA HAMNER BOBO, CL</div>
GENERAL INFORMATION		
IN THE CIRCUIT COURT OF TUSCALOOSA COUNTY, ALABAMA MOLLIE K. BASS ET AL v. SPEEDCO, INC.		
First Plaintiff: <input type="checkbox"/> Business <input checked="" type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other		
First Defendant: <input checked="" type="checkbox"/> Business <input type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other		
NATURE OF SUIT: Select primary cause of action, by checking box (check only one) that best characterizes your action:		
<div>TORTS: PERSONAL INJURY</div> <div><input type="checkbox"/> WDEA - Wrongful Death</div> <div><input checked="" type="checkbox"/> TONG - Negligence: General</div> <div><input type="checkbox"/> TOMV - Negligence: Motor Vehicle</div> <div><input type="checkbox"/> TOWA - Wantonness</div> <div><input type="checkbox"/> TOPL - Product Liability/AEMLD</div> <div><input type="checkbox"/> TOMM - Malpractice-Medical</div> <div><input type="checkbox"/> TOLM - Malpractice-Legal</div> <div><input type="checkbox"/> TOOM - Malpractice-Other</div> <div><input type="checkbox"/> TBFM - Fraud/Bad Faith/Misrepresentation</div> <div><input type="checkbox"/> TOXX - Other: _____</div> <div>TORTS: PERSONAL INJURY</div> <div><input type="checkbox"/> TOPE - Personal Property</div> <div><input type="checkbox"/> TORE - Real Property</div> <div>OTHER CIVIL FILINGS</div> <div><input type="checkbox"/> ABAN - Abandoned Automobile</div> <div><input type="checkbox"/> ACCT - Account & Nonmortgage</div> <div><input type="checkbox"/> APAA - Administrative Agency Appeal</div> <div><input type="checkbox"/> ADPA - Administrative Procedure Act</div> <div><input type="checkbox"/> ANPS - Adults in Need of Protective Service</div>		
<div>OTHER CIVIL FILINGS (cont'd)</div> <div><input type="checkbox"/> MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/Enforcement of Agency Subpoena/Petition to Preserve</div> <div><input type="checkbox"/> CVRT - Civil Rights</div> <div><input type="checkbox"/> COND - Condemnation/Eminent Domain/Right-of-Way</div> <div><input type="checkbox"/> CTMP - Contempt of Court</div> <div><input type="checkbox"/> CONT - Contract/Ejectment/Writ of Seizure</div> <div><input type="checkbox"/> TOCN - Conversion</div> <div><input type="checkbox"/> EQND - Equity Non-Damages Actions/Declaratory Judgment/Injunction Election Contest/Quiet Title/Sale For Division</div> <div><input type="checkbox"/> CVUD - Eviction Appeal/Unlawful Detainer</div> <div><input type="checkbox"/> FORJ - Foreign Judgment</div> <div><input type="checkbox"/> FORF - Fruits of Crime Forfeiture</div> <div><input type="checkbox"/> MSHC - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition</div> <div><input type="checkbox"/> PFAB - Protection From Abuse</div> <div><input type="checkbox"/> FELA - Railroad/Seaman (FELA)</div> <div><input type="checkbox"/> RPRO - Real Property</div> <div><input type="checkbox"/> WTEG - Will/Trust/Estate/Guardianship/Conservatorship</div> <div><input type="checkbox"/> COMP - Workers' Compensation</div> <div><input type="checkbox"/> CVXX - Miscellaneous Circuit Civil Case</div>		
ORIGIN: F <input checked="" type="checkbox"/> INITIAL FILING A <input type="checkbox"/> APPEAL FROM DISTRICT COURT O <input type="checkbox"/> OTHER		
R <input type="checkbox"/> REMANDED T <input type="checkbox"/> TRANSFERRED FROM OTHER CIRCUIT COURT		
HAS JURY TRIAL BEEN DEMANDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <div>Note: Checking "Yes" does not constitute a demand for a jury trial. (See Rules 38 and 39, Ala.R.Civ.P, for procedure)</div>		
RELIEF REQUESTED: <input checked="" type="checkbox"/> MONETARY AWARD REQUESTED <input type="checkbox"/> NO MONETARY AWARD REQUESTED		
ATTORNEY CODE: STR017 4/7/2017 5:07:14 PM /s/ BERNEY LEOPOLD STRAUSS M		
Date Signature of Attorney/Party filing this form		
MEDIATION REQUESTED: <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> UNDECIDED		



IN THE CIRCUIT COURT OF TUSCALOOSA, ALABAMA

MOLLIE K. BASS AND
MANUEL A. RODRIGUEZ

VERSUS

SPEEDCO, INC.

CIVIL ACTION NO. _____

COMPLAINT
JURISDICTIONAL PREAMBLE

COME NOW the Plaintiffs, Mollie K. Bass and Manuel A. Rodriguez, and in accordance with the *Rules of Civil Procedure*, files the following claim for relief and the Defendant, Speedco, Inc., as follows:

1.

Plaintiffs are citizens and residents of the County of Clay, City of Jacksonville, Florida.

2.

Made Defendant herein is Speedco, Inc., a Tennessee corporation, having its principal place of business in the City of Nashville, Tennessee. The agent for service of process is National Registered Agents, Inc. whose address is listed with the Alabama Secretary of State as 2 N. Jackson Street, Suite 605, Montgomery, Alabama. 36104.

3.

Plaintiffs' claims are brought pursuant to the laws of the State of Alabama.

4.

Jurisdiction and venue of this action are proper in Tuscaloosa County, Alabama.

5.

The amount in controversy is within the jurisdictional limits of this Honorable Court..

FIRST CAUSE OF ACTION
NEGLIGENCE

Plaintiffs, Mollie K. Bass and Manuel A. Rodriguez, allege against the Defendant, Speedco, Inc., as follows:

6.

Plaintiffs adopt and reallege all prior paragraphs as if fully set out herein. On or about April 12, 2015, Plaintiffs, Mollie K. Bass and Manuel A. Rodriguez, suffered damages when the engine of Plaintiff Manuel Rodriguez' 1998 Classic Freightliner collapsed on itself resulting in destruction of the left frontend suspension and tire assembly of the tractor-trailer and causing the Plaintiffs to sustain damages and severe and disabling bodily injuries near Vidor, Texas. The proximate cause of Plaintiffs' damages was the negligent work that Speedco, Inc. and its employees who were in the scope of their employment at the time the work was supposed to have been performed, did or failed to do on or about April 11, 2015 in Cottondale, Alabama.

7.

As a proximate result of the negligence of the Defendant, Speedco, Inc., the Plaintiffs were caused to suffer the following injuries and damages: Plaintiff, Manuel A. Rodriguez, suffered damages to his property; in addition to this loss, Plaintiffs were injured; the Plaintiffs were permanently injured; the Plaintiffs were caused to suffer pain; the Plaintiffs were caused to suffer mental anguish and will suffer mental anguish in the future; the Plaintiffs were caused to incur and will incur in the future medical bills, hospital bills, and other medical expenses; the Plaintiff was caused to incur lost wages and will incur lost wages in the future.

WHEREFORE, the Plaintiffs, Mollie K. Bass and Manuel A. Rodriguez, demand Judgment against the Defendant, Speedco, Inc., for compensatory damages, general damages, property damages, and such other damages as allowed by law and the State of Alabama in an amount that is within the jurisdictional limits of the Honorable Court, plus interests and costs.

SECOND CAUSE OF ACTION
WANTONNESS

Plaintiffs, Mollie K. Bass and Manuel A. Rodriguez, allege against the Defendant, Speedco, Inc., as follows:

8.

On or about April 12, 2015, Plaintiffs, Mollie K. Bass and Manuel A. Rodriguez, suffered damages when the engine of Plaintiff Manuel Rodriguez' 1998 Classic Freightliner collapsed on itself resulting in destruction of the left frontend suspension and tire assembly of the tractor-trailer and causing the Plaintiffs to sustain damages and severe and disabling bodily injuries near Vidor, Texas. The proximate cause of Plaintiffs' damages was the wanton failure of Speedco, Inc. and its employees who were in the scope of their employment at the time the work was supposed to have been performed, on or about April 11, 2015 in Cottondale, Alabama

9.

As a proximate result of the wantonness of the Defendant, Speedco, Inc., the Plaintiffs were caused to suffer the following injuries and damages: Plaintiff, Manuel A. Rodriguez, suffered damages to his property; in addition to this loss, Plaintiffs were injured; the Plaintiffs were permanently injured; the Plaintiffs were caused to suffer pain; the Plaintiffs were caused to suffer mental anguish and will suffer mental anguish in the future; the Plaintiffs were caused to incur and will incur in the future medical bills, hospital bills, and other medical expenses; the Plaintiff was caused to incur lost wages and will incur lost wages in the future.

WHEREFORE, the Plaintiffs, Mollie K. Bass and Manuel A. Rodriguez, demand Judgment against the Defendant, Speedco, Inc., for compensatory damages, general damages, property damages, and such other damages as allowed by law and the State of Alabama in an amount that is within the jurisdictional limits of the Honorable Court, plus interests and costs.

THIRD CAUSE OF ACTION
NEGLIGENT TRAINING

Plaintiffs, Mollie K. Bass and Manuel A. Rodriguez, allege against the Defendant, Speedco, Inc., as follows:

10.

Plaintiffs adopts and incorporates by reference the relevance portions of all prior paragraphs:

11.

Defendant, Servico, Inc., had a duty as an employer and supervisor to give, supervise and control the necessary and proper training of its employees so that they could carry out their job duties in a reasonable and safe manner.

12.

Defendant, Servico, Inc., failed to give, supervise and control the necessary and proper training of its employees.

13.

As a proximate result of the negligence of the Defendant, Servico, Inc., the Plaintiffs, Mollie K. Bass and Manuel A. Rodriguez, were caused to suffer the following injuries and damages: Plaintiff, Manuel A. Rodriguez, suffered damages to his property; in addition to this loss, Plaintiffs were caused to suffer physical pain and mental anguish, which they still suffer and will suffer in the future; they were and are caused to undergo medical treatment and care for their

injuries and will be caused to undergo further such treatment in the future; they were caused to incur medical bills, hospital bills and other medical expenses in and about the care and treatment of their injuries, and they will incur such medical expenses in the future; they were permanently injured as well.

WHEREFORE, Plaintiffs. MOLLIE K. BASS and MANUEL A. RODRIGUEZ, demand Judgment against the Defendant, Servico, Inc., for compensatory damages, general damages, property damages, and such other damages as allowed by law and the State of Alabama in an amount that is within the jurisdictional limits of the Honorable Court, plus interests and costs.

FIFTH CAUSE OF ACTION
WANTON TRAINING

14.

Plaintiffs, Mollie K. Bass and Manuel A. Rodriguez, allege against the Defendant, Speedco, Inc., as follows:

15.

Plaintiffs adopts and incorporates by reference the relevance portions of all prior paragraphs:

16.

Defendant, Servico, Inc., had a duty as an employer and supervisor to give, supervise and control the necessary and proper training of its employees so that they could carry out their job duties in a reasonable and safe manner.

17.

By failing to give the proper training, Defendant, Servico, Inc., knew or should have known that its actions would likely cause injury to another person or damage to property.

18.

As a proximate result of the wantonness of the Defendant, the Plaintiffs, Mollie K. Bass and Manuel A. Rodriguez, were caused to suffer the following injuries and damages: Plaintiff, Manuel A. Rodriguez, suffered damages to his property; in addition to this loss, Plaintiffs were caused to suffer physical pain and mental anguish, which they still suffer and will suffer in the future; they were and are caused to undergo medical treatment and care for their injuries and will be caused to undergo further such treatment in the future; they were caused to incur medical bills, hospital bills and other medical expenses in and about the care and treatment of their injuries, and they will incur such medical expenses in the future; they were permanently injured as well.

WHEREFORE, Plaintiffs. MOLLIE K. BASS and MANUEL A. RODRIGUEZ, demand Judgment against the Defendant, Servico, Inc., for compensatory damages, general damages, property damages, and such other damages as allowed by law and the State of Alabama in an amount that is within the jurisdictional limits of the Honorable Court, plus interests and costs.

Respectfully submitted,

By: /s/ Berney L. Strauss
Berney L. Strauss (5646-S67B)
Counsel of Record for Plaintiffs,
MOLLIE K. BASS and
MANUEL A. RODRIGUEZ

OF COUNSEL:

STRAUSS & KING, APLC
406 Magazine Street, Suite 300
New Orleans, Louisiana 70130
Telephone: (504) 523-0033
FAX: (504) 523-0109

CERTIFICATE OF SERVICE

This is to certify that I have on April 7, 2017, electronically filed the foregoing Complaint with the Clerk of Court using the Alafile system.

/s/Berney L. Strauss

Berney L. Strauss



AlaFile E-Notice

63-CV-2017-900442.00

To: BERNEY LEOPOLD STRAUSS MR
berneylstrauss@yahoo.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF TUSCALOOSA COUNTY, ALABAMA

MOLLIE K. BASS ET AL V. SPEEDCO, INC.
63-CV-2017-900442.00

The following complaint was FILED on 4/7/2017 5:08:10 PM

Notice Date: 4/7/2017 5:08:10 PM

MAGARIA HAMNER BOBO
CIRCUIT COURT CLERK
TUSCALOOSA COUNTY, ALABAMA
714 GREENSBORO AVENUE
TUSCALOOSA, AL, 35401

205-349-3870
magaria.bobo@alacourt.gov



AlaFile E-Notice

63-CV-2017-900442.00

To: SPEEDCO, INC.
NATIONAL REGISTERED AGEN
2 N. JACKSON ST, STE. 605
MONTGOMERY, AL, 36104

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF TUSCALOOSA COUNTY, ALABAMA

MOLLIE K. BASS ET AL V. SPEEDCO, INC.
63-CV-2017-900442.00

The following complaint was FILED on 4/7/2017 5:08:10 PM

Notice Date: 4/7/2017 5:08:10 PM

Service by sheriff in 03 - MONTGOMERY County

MAGARIA HAMNER BOBO
CIRCUIT COURT CLERK
TUSCALOOSA COUNTY, ALABAMA
714 GREENSBORO AVENUE
TUSCALOOSA, AL, 35401

205-349-3870
magaria.bobo@alacourt.gov

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	SUMMONS - CIVIL -	Court Case Number 63-CV-2017-900442.00
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IN THE CIRCUIT COURT OF TUSCALOOSA COUNTY, ALABAMA
MOLLIE K. BASS ET AL V. SPEEDCO, INC.

NOTICE TO: SPEEDCO, INC., NATIONAL REGISTERED AGENT 2 N. JACKSON ST., STE. 605, MONTGOMERY, AL 36104
(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),
 BERNEY LEOPOLD STRAUSS MR
(Name(s) of Attorney(s))

WHOSE ADDRESS(ES) IS/ARE: 406 MAGAZINE STREET, SUITE 300, NEWORLEANS, LA 70130
(Address(es) of Plaintiff(s) or Attorney(s))

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:

☒ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☐ Service by certified mail of this Summons is initiated upon the written request of _____
(Name(s))
 pursuant to the Alabama Rules of the Civil Procedure.

4/7/2017 5:08:10 PM /s/ MAGARIA HAMNER BOBO By: _____
(Date) *(Signature of Clerk)* *(Name)*

☐ Certified Mail is hereby requested. _____
(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____
(Date)

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to _____
 _____ in _____ County,
(Name of Person Served) *(Name of County)*

Alabama on _____
(Date)

(Type of Process Server)

(Server's Signature)

(Address of Server)

(Server's Printed Name)

(Phone Number of Server)

original

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	SUMMONS - CIVIL -	Court Case Number 63-CV-2017-900442.00
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IN THE CIRCUIT COURT OF TUSCALOOSA COUNTY, ALABAMA
MOLLIE K. BASS ET AL V. SPEEDCO, INC.

NOTICE TO: SPEEDCO, INC., NATIONAL REGISTERED AGENT 2 N. JACKSON ST, STE. 605, MONTGOMERY, AL 36104

(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S).
BERNEY LEOPOLD STRAUSS MR

(Name(s) of Attorney(s))

WHOSE ADDRESS(ES) IS/ARE: 406 MAGAZINE STREET, SUITE 300, NEWORLEANS, LA 70130

(Address(es) of Plaintiff(s) or Attorney(s))

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:

☒ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.
☐ Service by certified mail of this Summons is initiated upon the written request of _____

(Name(s))

4/7/2017 5:08:10 PM /s/ MAGARIA HAMNER BOBO By: _____

(Date)

(Signature of Clerk)

(Name)

☐ Certified Mail is hereby requested.

(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____

(Date)

☒ I certify that I personally delivered a copy of this Summons and Complaint or other document to 16 Mary Ann
Nichols acct asst in Montgomery County,

(Name of Person Served)

(Name of County)

Alabama on 4/18/17

(Date)

(Type of Process Server)


B. Lewis
(Server's Signature)
B. Lewis
(Server's Printed Name)


MKSU
(Address of Server)

(Phone Number of Server)

63-CV-2017-900442.00
MOLLIE K. BASS ET AL V. SPEEDCO, INC.

C001 - MOLLIE K. BASS <div style="font-size: small;">(Plaintiff)</div>	v.	D001 - SPEEDCO, INC. <div style="font-size: small;">(Defendant)</div>
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63CV201790044200
SPEEDCO, INC.

Y



AlaFile E-Notice

63-CV-2017-900442.00

Judge: JOHN HENRY ENGLAND JR

To: STRAUSS BERNEY LEOPOLD
berneylstrauss@yahoo.com

NOTICE OF SERVICE

IN THE CIRCUIT COURT OF TUSCALOOSA COUNTY, ALABAMA

MOLLIE K. BASS ET AL V. SPEEDCO, INC.
63-CV-2017-900442.00

The following matter was served on 4/18/2017

D001 SPEEDCO, INC.
Corresponding To
SERVED PERSONALLY

MAGARIA HAMNER BOBO
CIRCUIT COURT CLERK
TUSCALOOSA COUNTY, ALABAMA
714 GREENSBORO AVENUE
TUSCALOOSA, AL, 35401

205-349-3870
magaria.bobo@alacourt.gov